



CITY OF NEW YORK  
**MANHATTAN COMMUNITY BOARD FOUR**  
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August 20, 2018

Marisa Lago  
Chair  
New York City Planning Commission  
120 Broadway  
31st Floor  
New York, NY 10271

James Patchett  
President and CEO  
NYC Economic Development Corporation  
110 William Street  
New York, NY 10038

**Re: Special Garment Center District Proposed Rezoning**

Dear Chair Lago and Mr. Patchett:

At its meeting on July 25, 2018, Manhattan Community Board 4 (MCB4) reviewed the application by the New York City Department of City Planning and (DCP) the New York City Economic Development Corporation (EDC) for proposed changes to the Special Garment Center District.

By a vote of 29 in favor, 0 opposed, 0 abstaining, and 0 present but not eligible to vote, MCB4 voted to recommend **denial of the application and proposed changes unless the modifications outlined below are made.**

**Background**

**Establishment of Special Garment Center District- 1987**

The Special Garment Center District (SGCD), established with Section 121-00 of the Zoning Resolution in 1987, was a commitment as part of the redevelopment of Times Square. At the time, members of the community feared the redevelopment would displace

the Garment Center, which had long been a vibrant network of garment related businesses. A study of the Garment Center commenced in 1985 and the district was established in 1987. The purpose of creating the special district was to preserve the garment-related uses and thousands of jobs that defined the area.

The boundaries of the SGCD were established between Broadway and 100 feet east of 9<sup>th</sup> Avenue and stretching from West 40<sup>th</sup> Street to midblock between West 34<sup>th</sup> and West 35<sup>th</sup> Streets<sup>1</sup>. The portion of the SGCD west of 8<sup>th</sup> Avenue is in Manhattan Community District 4 (MCD4) while the rest is in Manhattan Community District 5. Within the SGCD there was a Preservation Area that spanned from West 35<sup>th</sup> Street to West 40<sup>th</sup> Street between 100 feet west of 8<sup>th</sup> Avenue to 100 feet east of 9<sup>th</sup> Avenue, from West 35<sup>th</sup> Street to West 40<sup>th</sup> Street between 100 feet west of 7<sup>th</sup> Avenue and 100 feet east of 8<sup>th</sup> Avenue and from West 35<sup>th</sup> Street to West 37<sup>th</sup> Street between 100 feet west of Broadway to 100 feet east of 7<sup>th</sup> Avenue.

Under the zoning regulations of the SGCD, owners of buildings within the Preservation Area were required to obtain Certification from the City Planning Commission (CPC) in order to convert their manufacturing spaces into offices. Owners would also have to obtain a restrictive declaration to ensure that for every square foot of new office space, an equal amount of square footage would be preserved for manufacturing uses. At the time of the 1987 zoning action, industrial uses within the SGCD were in M1-5 and M1-6 districts.

The 1987 zoning text of the SGCD was intended to preserve in the mid-blocks while allowing conversions from manufacturing to commercial use along the avenues.

#### Hudson Yards Rezoning - 2005

In 2005, the area west of 9<sup>th</sup> Avenue from West 30<sup>th</sup> to West 41<sup>st</sup> Street, between 9<sup>th</sup> and 11<sup>th</sup> Avenues was rezoned in conjunction with the creation of the Special Hudson Yards District (SHYD). As an action in that rezoning, text amendments were made to the SGCD, including the establishment of Preservation Areas P-1 and P-2. Of these two areas, only P-2 was within Manhattan Community District 4 (MCD4). Preservation Area P-1 was established east of 8<sup>th</sup> Avenue, while Preservation Area P-2 was established west of 8<sup>th</sup> Avenue<sup>2</sup>.

The intent of creating Subdistrict P-2 was to preserve garment-related uses while also incentivizing residential development, given that area's historic residential character. What distinguished P-1 from P-2 was its mix of both historic residential uses and tenements and a series of loft conversions to residential uses by variance in the mid-1980s and 1990s. The intent of this rezoning of the SGCD from both the community and DCP's perspective was to allow residential redevelopment of vacant parcels or one-story garages in P-2 while preserving the existing manufacturing uses in existing buildings.

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<sup>1</sup> See Attachment A: SGCD Boundaries, 1987

<sup>2</sup> See Attachment B: Current SGCD Map

Additionally, the area between West 39<sup>th</sup> and West 40<sup>th</sup> Streets between 8<sup>th</sup> and 9<sup>th</sup> Avenues was removed from the SGCD and mapped as part of the SHYD in order to allow high density development on that block.

Recognizing that Preservation Area P-2 had a mix of industrial and residential uses and that it included many vacant or underdeveloped parcels, the zoning allowed for new high density residential developments with the provision of Inclusionary Housing<sup>3</sup>.

At the time, MCB4 was particularly concerned about the 2,371 residential units existing in the then-proposed Special Hudson Yards District (SHYD), Subarea P-2 of the SGCD, and the Special West Chelsea District (SWCD) in 2004, with 1,931 residential units in Subarea P-2 respectively. In 2005, the Board commissioned a study from Clinton Housing Development Company to document the existing residential buildings in this study area. The Board requested that the demolition restrictions that were already in place for residential buildings in the Special Clinton District be extended to the SGCD and SHYD. Those zoning protections were finally added to the zoning text of the SGCD, which was certified as part of the Western Rail Yards rezoning (WRY rezoning) in 2009 and adopted in 2010.

#### Illegal Conversion of Manufacturing Space

Although the clear intent of the SGCD was to “maintain the viability of apparel production in the Garment Center by creating a Preservation Area in selected midblocks and limiting conversion to office use in the Preservation Area”, the City of New York provided virtually no enforcement for the preservation of manufacturing space from 1990 to the present, illegal conversions of manufacturing space proceeded in the Preservation Areas. Violations were issued but no actions were taken by City agencies. Of the 8 million square feet of manufacturing space in the SGCD in 1987, only 180,366 square feet, or 2.25% was preserved.

The Board recognizes the broader global shifts in manufacturing, but the City not enforcing its own zoning resolution aided and abetted illegal conversions as opposed to managing them. A self-fulfilling prophecy has taken place—one in which manufacturing space has disappeared while the City has not enforced the zoning resolution to preserve that space. Despite the restrictive declaration requirement established in 1987 and the 2005 changes to the zoning text, the SGCD lost manufacturing space through illegal conversions. **As of 2017, 5 million of the 8.5 million square feet in the Preservation Areas were nonconforming uses after having been illegally converted from manufacturing to office space.**

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<sup>3</sup> Under the Inclusionary Housing Program, buildings in the SGCD could have their FAR increased from 10.0 to 12.0 if they dedicated a portion of their new development for permanently affordable housing or created such housing at an offsite location.

## SGCD Proposed Text Amendments 2007-2017

Between 2007 and 2011, DCP proposed Text Amendments on three occasions:

Those efforts were poorly conceived, poorly presented and poorly received by the multiple stakeholders in the Garment Center, the affected community boards, and elected officials.

### Proposed 2017 Changes

In March 2017, with less than a month's notice, the City proposed a package of changes to the SGCD that included text amendments to lift the manufacturing preservation requirements of the SGCD. Key among the changes was the lifting of manufacturing preservation requirements to allow for more office space development. In that same action, EDC proposed a plan to incentivize and facilitate the relocation of the Garment Center to the Brooklyn Army Terminal and the Bush Terminal—both of which are in Sunset Park, Brooklyn.

There was a strong negative reaction from Manhattan Community Boards 4 and 5, elected officials, and the Garment Center's business associations, unions, and designers. Following the community's response, there was an agreement between Deputy Mayor Alicia Glen, Manhattan Borough President Gale Brewer, and then-Council Member Corey Johnson to form the Garment Center Steering Committee<sup>4</sup>. The Committee was formed in May 2017 and worked with EDC and DCP for months to arrive at a consensus. After seven meetings that took place between May and August 2017 and serious and rigorous debate, the Committee commissioned a report based on the consensus it achieved.<sup>5</sup>

That report, the Garment Center Steering Committee Report, was based on the following guiding principles:

- The Garment Center is a unique, close-knit, vital and world-class ecosystem of garment-related businesses;
- Preserving a core of garment manufacturing in the Garment Center is a priority for the Committee and central to future decision-making or interventions in the area;
- Garment manufacturing serves as a foundation for the Garment Center and citywide garment industry;

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<sup>4</sup> The Steering Committee is comprised of local elected officials, representatives from Community Boards 4 and 5, the Council of Fashion Designers of America, the Design Trust for Public Space, the Garment Center Supplier Association, the Garment District Alliance, Pratt Center for Community Development, the Pratt Center for Community Development, the Real Estate Board of New York, the Theatrical Wardrobe Union, Workers United, and YEOHLEE Inc.

<sup>5</sup> Garment Center Report-- Celeste Frye of Public Works Partners and Ben Margolis, independent consultant, (<http://manhattanbp.nyc.gov/downloads/pdf/GarmentCenterReport.pdf>)

- Real estate stability is essential to the operation and prospering of garment manufacturing in the Garment Center;
- Programs providing support and preparation for future innovations throughout the garment industry are essential and complementary to real estate solutions; and
- Recommendations should be crafted for industry-wide and district-wide support, not for any one individual manufacturer, garment-related business, or site, and not only for existing businesses but for future generations.

The report also outlined the Committee’s concerns. A majority of the discussion among members of the Steering Committee revolved around real estate. As such, the Committee made the following set of recommendations:

#### Section I. Real Estate

1. Create a custom NYC Industrial Development Agency (IDA) program to retain long-term garment production space in the Garment Center;
2. Advance a framework for a public-private building purchase for dedicated garment production space in mid-Manhattan;
3. Create a mechanism in the zoning text to phase out the Preservation Requirements in sub-areas P-1 and P-2 of the Special Garment Center District with the condition that some space continues to be preserved for garment manufacturing;
4. Institute hotel restrictions in the Garment Center as part of the Special Garment Center District zoning changes;
5. Support the role of nonprofit partner(s) in efforts to preserve a core of garment manufacturers in mid-Manhattan;

The Report’s recommendations also focused on the following areas:

- Workforce development and business support
- Placemaking

#### **Proposed Changes to the SGCD - 2018**

There are three elements of the proposed changes to the SGCD:

- An IDA program to provide tax incentives for preserving manufacturing space in the Garment Center
- Funds for acquisition of a manufacturing building in the Garment Center
- A series of text amendments that will eliminate preservation requirements, establish a special permit requirement for hotels, and standardize signage regulations, among other changes

## Tax Incentives for Preserving Manufacturing Space

In its report, the Garment Center Steering Committee called for the preservation of 500,000 to 750,000 square feet of manufacturing space within the Garment Center. Still, the report noted that a number of members recommended a target of 1 million square feet.

On May 30, 2018, MCB4 was notified that EDC would, through its IDA, establish a tax benefit program for landlords in the Garment Center who provide affordable manufacturing space. A public announcement regarding the tax incentives was made on June 4, 2018.

EDC, through the IDA, will grant owners access to tax benefits if they provide 15-year leases to manufacturing tenants at a rate of \$35 per square foot or lower.

EDC has currently identified 300,000 square feet of manufacturing space and is negotiating with several owners.

***MCB4 applauds this program but requests that an additional 200,000 square feet of manufacturing space be secured through these tax incentives for a total of 500,000 square feet of manufacturing space to be preserved through the tax incentive program. This amount should be secured prior to the lifting of any preservation requirements.***

***The Board also requests that the 180,366 square feet of manufacturing space that was preserved between 1987 and 2011 through deed restrictions required by the current zoning provisions, be preserved as manufacturing space in perpetuity.***

The Board recognizes EDC's serious commitment to recruit owners to the IDA's real estate tax incentives program from May 2018 until the present. The Board also understands that negotiating with multiple owners of multiple buildings is a diligent and time consuming process. MCB4 appreciates and encourages EDC to continue to secure an additional amount of space throughout the end of the Uniform Land Use Review Procedure (ULURP).

***MCB4 further requests that EDC work with building owners to be able to extend the length of the tax incentives and therefore the affordable rents beyond 15 years.***

## Acquisition of Manufacturing Building within the SGCD

To fulfil the Committee's request, the Mayor's office has committed \$20 million in City capital funding for the purchase of a manufacturing building, of approximately 150,000 square feet, within the SGCD. The acquisition will be done in partnership with a not-for-profit that will be selected through a Request for Expressions of Interest (RFEI) process. Once acquired, the building will be operated and managed by the not-for-profit company.

The proposed acquisition will provide garment manufacturing companies with long-term, affordable rental spaces.

***MCB4 supports the proposed acquisition of this new building. However, the Board requests that the City commit to increasing its allocation if more funds are needed for the building acquisition. This site must be identified and secured prior to the completion of the ULURP. The City’s financial contribution should be released prior to the lifting of the manufacturing preservation requirements of the SGCD. Furthermore, the City and its not for profit partner should both commit equity toward the acquisition of the building.***

Preservation of Garment Manufacturing in SGCD

Altogether, the total manufacturing square footage that MCB4 requests to be preserved and created is as follows:

Square Footage through Tax Incentives	500,000
Existing Preserved Manufacturing Square Footage	180,366
Square Footage from Building Acquisition	150,000
<b>Total – approximate</b>	<b>830,366</b>

This total meets and exceeds the Committees’ recommendation of 500,000 to 750,000 square feet of manufacturing space.

SGCD Zoning Proposed Text Amendments

DCP proposed the series of text amendments listed below to achieve the goals of the Garment District Steering Committee.

- New Subdistrict designations
- Lifting of preservation protections in the SGCD
- Manufacturing buildings in the proposed Subdistrict A-2, larger than 70,000 square feet, will be allowed to convert to commercial but not residential use
- Establishing a Special Permit requirement for hotel development in the SGCD
- Clarification of demolition and anti-harassment restrictions
- Establishment of Street Walls throughout SGCD
- Standardizing signage regulations across the SGCD
- Prohibiting Use Group 18 in areas zoned M1-6
- Develop an “A Text” to provide a zoning solution for illegal demolition sites in which hotel development creates permanent affordable housing

New Subdistrict Designations

DCP proposes to establish a Subdistrict A-1 in the area outlined in Attachment C, generally bound by West 40<sup>th</sup> Street to the north, 100 feet south of West 35<sup>th</sup>

Street to the south, between Broadway and 100 feet west of 8<sup>th</sup> Avenue<sup>6</sup>. With the exception of the western side of 8<sup>th</sup> Avenue, the proposed Subdistrict A-1 will be within Manhattan Community District 5's boundaries. DCP also proposes to rename the current P-2 Preservation Area to Subdistrict A-2. That Subdistrict will be entirely within MCD4's boundaries.

***MCB4 supports the proposed new Subdistrict designations.***

Lifting of preservation protections in the SGCD

DCP proposes to lift the manufacturing preservation requirements across the SGCD.

***MCB4 supports removing the manufacturing preservation requirements only if such an action will be accompanied by the EDC programs outlined above, which result in the preservation and/or addition of approximately 830,366 square feet of manufacturing space.***

Manufacturing buildings in the proposed Subdistrict A-2, larger than 70,000 square feet, will be allowed to convert to commercial use but not residential use

During the 2005 rezoning, MCB4 and DCP agreed on the same goal to allow redevelopment of underdeveloped lots to residential uses. This was both a means of reinforcing the mixed use character of the P-2 Area and to promote residential construction, which in turn would produce permanent affordable housing through the use of Inclusionary Housing.

However, the greater effect of the 2005 rezoning was the construction of hotels throughout the SGCD. Most of the lots that were vacant or underdeveloped in 2005 became hotels. As to date, 19 new hotel sites have resulted in a total of 4,546 hotel rooms with an additional 10 sites and 2,056 more in construction or with plans approved by the NYC Department of Buildings (DOB). The opportunities to build new housing on these sites have been lost and have created a large imbalance of new development.

Only, 3 sites were developed producing a total of 976 residential units, of which 203 are affordable.

Address	Project Name	Total Units	Total Affordable
320 West 38 <sup>th</sup> Street	Emerald Green	569	120

<sup>6</sup> See Attachment C: Proposed SGCD Map

350 West 37 <sup>th</sup> Street	Townsend	207	42
330 West 39 <sup>th</sup> Street	Crystal Green	200	41
<b>Total:</b>		<b>976</b>	<b>203</b>

The Board does not support language restricting buildings over 70,000 square feet from converting into residential use. Such a prohibition is not in keeping with the Board’s and DCP’s goal of preserving the historically residential character of the proposed Subdistrict A-2. The 2005 and 2010 text amendments reinforced and protected the area’s residential uses; this one should do the same.

***Therefore, the Board requests that the restriction allowing buildings over 70,000 square feet to convert to commercial use, be modified to also allow residential use, with the following conditions:***

- ***Conversion of buildings over 70,000 square feet can take place only with an Inclusionary Housing component***
- ***Residential conversion of the upper floors of a building can take place if the owner preserves a percentage of the lower full lot built lower floors for commercial or manufacturing use.***

The balance between commercial and residential use was not achieved in 2005. The Board and DCP must work to ensure that it is achieved with this rezoning.

Establishing a Special Permit requirement for hotel development in the SGCD

MCB4 has worked with DCP to develop a solution to manage the degree of hotel development within Preservation Area P-2 in the SGCD. The Board is pleased that the text amendment will include a special permit requirement for any new hotels in the SGCD.

In 2017, at the request of MCB4, Clinton Housing Development Company (CHDC) drafted a study of the area from West 35<sup>th</sup> to West 40<sup>th</sup> Streets between 8<sup>th</sup> Avenue and 100 feet west of 9<sup>th</sup> Avenue<sup>7</sup>. This area includes Subarea P-2 and the block to the north that was originally part of the Preservation Area, as well as the 9<sup>th</sup> Avenue corridor. That study area has seen a dramatic increase in hotel development and CHDC is currently updating the study with current information which is described below. Since 2009, the approximately five blocks that make up that area have gone from containing zero hotel rooms to 4,546 new hotels rooms. An additional 2,234 rooms are either under construction or have received permits from the Department of Buildings. The rapid development of hotels in this area has led to the loss of historic neighborhood character. Further, the majority of the hotels constructed in the SGCD have not been designed to respond to the

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<sup>7</sup> See [Draft report of Hotel & Residential Development in and Around the Garment Center, dated September 2017.](#)

surrounding buildings, causing a visually jarring effect on the fabric of the neighborhood.

DCP's proposed findings for granting a Special Permit are as follows:

- a) the location of such proposed #transient hotel# within the Special District will not impair the achievement of a diverse and harmonious mix of #commercial#, #manufacturing# and #community facility uses# within Subdistrict A-1 and of #residential#, #commercial#, #manufacturing# and #community facility uses# in Subdistrict A-2, consistent with the applicable district regulations;
- b) such #transient hotel use# is consistent with the planning objectives of the Special District; and
- c) the design of such #transient hotel# is appropriate to its program and will not impair the character of the area.

***The language in these proposed findings differ greatly from the findings for DCP's proposed M1 Hotel Special Permit<sup>8</sup>. The Board requests that DCP make both findings consistent.***

The Board requests that currently proposed SGCD Hotel findings, with the proposed amendments from MCB4, as detailed in its ULURP letter of July 2, 2018<sup>9</sup>, for siting hotels in M1 districts be amended as outlined below, and applied to the SGCD:

a) Impact on Surrounding Uses

*DCP Proposed M1 Finding:* the site plan incorporates elements that are necessary to address any potential conflicts between the proposed #use# and adjacent #uses#, such as the location of the proposed access to the #building#, the #building's# orientation and landscaping;

*MCB4 Requested Amendment:* the site plan incorporates elements that are necessary to address any potential conflicts between the proposed #use# and adjacent #uses#, such as the location of the proposed access to the #building#, the #building's# orientation and landscaping, and storage space for trash and for linens;

b) Impact on Vehicular and Pedestrian Congestion

*DCP Proposed Finding:* such #use# will not cause undue vehicular or pedestrian congestion on local #streets; and

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<sup>8</sup> N 180349 ZRY – DCP Proposed M1 Hotel Text Amendment, dated April 25, 2018.

<sup>9</sup> See Letter to DCP, dated July 2, 2018. <http://www.nyc.gov/html/mancb4/downloads/pdf/June-2018/11-letter-to-cpc-re-citywide-hotel-special-permit-for-m1-zoning-districts.pdf>

*MCB4 Requested Amendment:* such #use# will not cause undue vehicular or pedestrian congestion on local #streets; or reduction in the availability of nearby parking;

c) Impact on Neighborhood Character

*DCP Proposed Finding:* such #use# will not impair the essential character or future use or development of the surrounding area.

*MCB4 Requested Amendment:* such #use# will not impair the essential character or future use or development of the surrounding area and in areas where M1 districts are adjacent to #residential# districts, such #use# shall be compatible with adjacent #residential# districts; and

d) Concentration of Hotels

Such #use# shall not cause undue concentration of such #uses# within a 500 foot radius of the proposed location.

***The Board previously requested that these findings be part of the proposed Special Permit requirement for hotel development in M1 districts and it requests that the same findings be extended to the SGCD. Additionally, the Board requests that public purpose hotels also be required to obtain a Special Permit.***

***With these conditions, MCB4 supports this amendment which will include a special permit requirement for any new hotels in the SGCD.***

Although the Board is supportive of public purpose hotels, it is concerned that their exclusion from the Special Permit requirement could lead to the disproportionate construction of some within the SGCD. Furthermore, the Board is also concerned that these buildings could later be easily converted to commercial hotels.

Clarification of demolition and anti-harassment restrictions

DCP proposes to rename Section 121-50 of the SGCD, previously titled SUPPLEMENTAL REGULATIONS IN PRESERVATION AREA P-2, the section will now more clearly read “ANTI-HARASSMENT AND DEMOLITION REGULATIONS IN SUBDISTRICT A-2”.

***MCB4 supports this section title change.***

Clarifying the demolition restriction in the SGCD will ensure that the residential character of the proposed A-2 Subarea is preserved. It also ensures that many of our district’s long-term tenants are not displaced due to real estate development pressures.

## Establishment of Street Walls throughout SGCD

### Mid blocks—8<sup>th</sup> to 9<sup>th</sup> Avenue

As part of the 2005 Hudson Yards rezoning, DCP included certain text amendments to P-2 of the SGCD to establish both height limits and street wall requirements. The January 2005 CPC report on the Hudson Yards Rezoning explained that these new street wall requirements for P-2 of the SGCD were enacted to “ensure consistency with the Garment Center’s distinctive built form of high street wall loft buildings”,<sup>10</sup>. On January 14, 2010, DCP filed a Land Use Review Application to clarify its requirements for minimum street wall height in SGCD Preservation Area P-2 and to extend the same street wall requirements to Subdistrict E of the SHYD. On June 29, 2010, the amendment to New York City Zoning Resolutions §§93-50, 93-53, 93-55, and 121-32 regarding the Hudson Yards and Garment Center Street Wall Text was adopted. The clarified street wall height requirements set forth affected the area bound by 40th Street to the North, 100 feet east of 9th Avenue to the West, 35th Street to the south, and 100 feet west of 8th Avenue to the East.

### 8<sup>th</sup> Avenue

Street walls are a result of the 1916 Zoning Resolution and have literally shaped the form of the Garment Center. Throughout our District, the Board has worked to ensure that street walls and setbacks, which provide consistency and neighborhood character, are maintained.

However, there are two sites on 8<sup>th</sup> Avenue where a lack of street wall has resulted in developments with setback plazas starkly out of character with the strong street walls along the 8<sup>th</sup> Avenue area, causing a disruption in the neighborhood fabric:

- 521 8<sup>th</sup> Avenue
- 585 8<sup>th</sup> Avenue.

DCP has proposed regulations to building height and setbacks that will affect areas zoned M1-6. Within MCD4’s boundaries, this proposed change would apply to the area from West 35<sup>th</sup> Street to West 39<sup>th</sup> Street between 8<sup>th</sup> Avenue and 100 feet west of 8<sup>th</sup> Avenue. The proposed zoning text amendment will require that buildings conform to existing neighborhood character—particularly the street walls.

***MCB4 therefore supports this proposed change.***

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<sup>10</sup> Zoning Text Amendment N040500(A) ZRM  
<https://www1.nyc.gov/assets/planning/download/pdf/about/cpc/040500a.pdf> . Page 13

***The Board would also like to note its support for Manhattan Community Board 5's (MCB5) position as stated in the letter of July 13, 2018<sup>11</sup> in which the Board requested that these street wall requirements be maintained within Manhattan Community District 5 boundaries as well and that the proposed language in section 121-32 (a) of the SGCD be revised to prohibit the creation of midblock plazas, which do not abide by the street wall requirements.***

#### Standardizing signage regulations across the SGCD

DCP proposes to standardize sign regulations throughout the SGCD in accordance with the requirements already in place for the area zoned as C6-4. The following signage requirements would be extended to the entire SGCD:

- Both illuminated and non-illuminated signs are allowed to be up to 5 times the street frontage, but no more than 500 square feet per sign.
- No sign may be more than 40 feet in height.
- No signs are permitted on roofs except that a vertical sign attached to a wall no more than 28 inches wide may extend no higher than 15 feet above roof level.
- Advertising signs are not permitted.

***MCB4 supports these proposed standards. Furthermore, MCB4 recommends further regulations regarding the size and intensity of light for illuminated signs in the SGCD. The following signs should not be allowed:***

- ***Kinetic Facades and/or Billboards***
- ***Augmented Reality Presentations and/or Billboards***
- ***QR, Snap Tags, or any other mobile/smart wearable technology that produces a digital message only view-able by a smart/mobile camera***
- ***Experiential marketing or 3 dimensional displays***
- ***Billboard with camera mounted technology***
- ***Motion-graphic or video billboards***

For years, the Board has received complaints from residents of the west side whose homes receive residual light from illuminated signs that have been erected several blocks away. In this whole matter, the Board does not want the flashing signs of Times Square to bleed south. Because of the mixed use character of the proposed A-2 Subarea, the Board is requesting for the zoning text provision to cap the lumens in the sign consistent with the mixture of commercial and manufacturing uses.

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<sup>11</sup> See Attachment D: MCB5 Resolution, dated July 13, 2018.

The Board would also like to note that although they will be prohibited in the proposed Subdistrict A-2, flashing signs will be permitted in the proposed Subdistrict A-1.

***Therefore, MCB4 supports the MCB5 position as stated in the letter of July 13, 2018 that the proposed language in section 121-20 of the SGCD regarding the prohibition of flashing lights be revised to include Subdistrict A-1.***

Prohibiting Use Group 18 in areas zoned M1-6

DCP proposes to prohibit Use Group 18 throughout areas zoned M1-6, which within MCD4’s boundaries, would only apply to the area from West 35<sup>th</sup> Street to West 39<sup>th</sup> Street between 8<sup>th</sup> Avenue and 100 feet west of 8<sup>th</sup> Avenue. Use Group 18 encompasses industrial uses that involve hazards such as potential fire or explosion, result in pedestrian or freight traffic, or involve a concentration of materials that can be harmful to the public. Use Group 18 is already prohibited in the portion of the SGCD that is zoned C6-4M.

***The Board supports this amendment, which creates consistency across the SGCD and ensures that heavy manufacturing uses do not develop alongside the heavily commercial and residential uses that already exist within the SGCD.***

Develop an “A Text” to provide a zoning solution for illegal demolition sites in which hotel development creates permanent affordable housing

Since December 2015, the Board has seen two sites within the SGCD in which owners have attempted to illegally demolish their buildings.

<b>Building Address</b>	<b>Block</b>	<b>Lot</b>	<b># of buildings</b>	<b># of Units</b>	<b>Date Board Became Aware</b>
319-321 West 38 <sup>th</sup> Street	762	23	3	16	December 2015
317-319 West 35 <sup>th</sup> Street	759	30	2	28	May 2016

**5      44**

Altogether, MCD4 has 11 demolition sites totaling 23 buildings and 166 residential units. All 44 units on these sites have been vacated and the buildings are partially demolished. This scenario has been seen across our district’s four Special Districts.

***In order to provide a solution for these sites in the SGCD, the Board requests that an “A Text” be created to, in cases where a demolition permit was granted in error by DOB:***

- ***In a case where an owner is providing permanent affordable housing on the site, to allow residential use below commercial use***
- ***Grandfather such sites from the proposed SGCD hotel Special Permit requirement***
- ***To make the base FAR similar for both commercial and residential developments in which permanent affordable housing is included***
- ***Create a text reference to the Hudson Yards Inclusionary Housing zoning to allow the use of both District Improvement Bonus and Inclusionary Housing Bonus in a pari passu manner***
- ***Create a text reference to the Hudson Yards Inclusionary Housing zoning to allow a broader range of income bands for such housing.***

#### Historic Properties and Potential Landmarks

DCP identified the following historic resources as NYC Landmark-eligible (NYCL-eligible) in its Environmental Assessment Statement for these Text Amendments:

- Manhattan Center – 311 West 34<sup>th</sup> Street
- New Yorker Hotel – 481 8<sup>th</sup> Avenue
- Sloan House YMCA – 360 West 34<sup>th</sup> Street.

In 2005, through the Hudson Yards Environmental Impact Statement, a series of NYCL-eligible or State and National Registers of Historic Places-eligible (S/NR-eligible) buildings have also been identified. As the Board moves ahead with these text amendments to further develop the SGCD and its surrounding blocks, MCB4 requests that the Landmarks Commission review and calendar the following specific properties:

- 300 West 38<sup>th</sup> Street
- Former NY Edison Co. – 308-312 West 36<sup>th</sup> Street
- Former Barbour Dormitory – 330 West 36<sup>th</sup> Street
- Webster Apartments – 419 West 34<sup>th</sup> Street.

Two of the above locations, the New Yorker Hotel and the Sloan House YMCA, were noted as being overbuilt to both the existing and proposed 2005 Hudson Yards rezoning. Please see Attachment E for full descriptions on each historic site.

***The Board requests that all the above sites be designated as NYC Landmarks.***

## Conclusion

MCB4 is encouraged to see the City, through DCP and EDC, engaging with all stakeholders—workers’ unions, the local theater industry, manufacturers, property owners, and the Garment Center BID to achieve substantial change to meet the needs of multiple stakeholders in the Garment Center.

MCB4 recommends denying the approval of the proposed Text Amendments to the SGCD unless the conditions below are met:

- A minimum of 500,000 square feet of manufacturing space to be preserved through the proposed IDA tax incentive program.
  - The 2017 Garment Center Steering Committee report called for the preservation of 500,000 to 750,000 square feet of manufacturing space. MCB4 appreciates the currently identified 300,000 square feet of manufacturing space but requests an additional 200,000 square feet be secured through these tax incentives.
- The 180,366 square feet of manufacturing space that was preserved between 1987 and 2011 through deed restrictions required by the current zoning provisions, should be preserved as manufacturing space in perpetuity.
- Building acquired by the City must be a minimum of 150,000 square feet and the City must commit to increasing its capital funding allocation if more funds are needed for the building acquisition.

Between the real estate tax incentives and building acquisition, the proposed changes should preserve 830,366 square feet of manufacturing space, meeting the Steering Committee’s request of between 500,000 and 750,000 square feet of manufacturing space.

Additionally, the Board believes the following recommendations will further the goals of the SGCD and ensure that the zoning regulations respond to the community’s needs:

- New Subdistrict designations
- Lifting of preservation protections in the SGCD
- Manufacturing buildings in the proposed Subdistrict A-2, larger than 70,000 square feet, will be allowed to convert to commercial but not residential use
- Establishing a Special Permit requirement for hotel development in the SGCD
- Clarification of demolition and anti-harassment restrictions
- Establishment of Street Walls throughout SGCD
- Standardizing signage regulations across the SGCD
- Prohibiting Use Group 18 in areas zoned M1-6
- Develop an “A Text” to provide a zoning solution for illegal demolition sites in which hotel development creates permanent affordable housing

Furthermore, MCB4 recommends that the Landmarks Commission review and calendar the following specific properties to be designated as NYC Landmarks:

- Manhattan Center – 311 West 34<sup>th</sup> Street
- New Yorker Hotel – 481 8<sup>th</sup> Avenue
- Sloan House YMCA – 360 West 34<sup>th</sup> Street
- 300 West 38<sup>th</sup> Street
- Former NY Edison Co. – 308-312 West 36<sup>th</sup> Street
- Former Barbour Dormitory – 330 West 36<sup>th</sup> Street
- Webster Apartments – 419 West 34<sup>th</sup> Street.

MCB4 would like to thank DCP and EDC with their dedicated and diligent staff along with the offices of the City Council Speaker and Manhattan Borough President for their commitment and cooperation in preparation for both the Garment Center Tax Incentive Program and the proposed Text Amendments in the ULURP.

MCB4 looks forward to continue working with both agencies and elected officials to ensure the success and preservation of New York City's Historic Garment Center.

Sincerely,



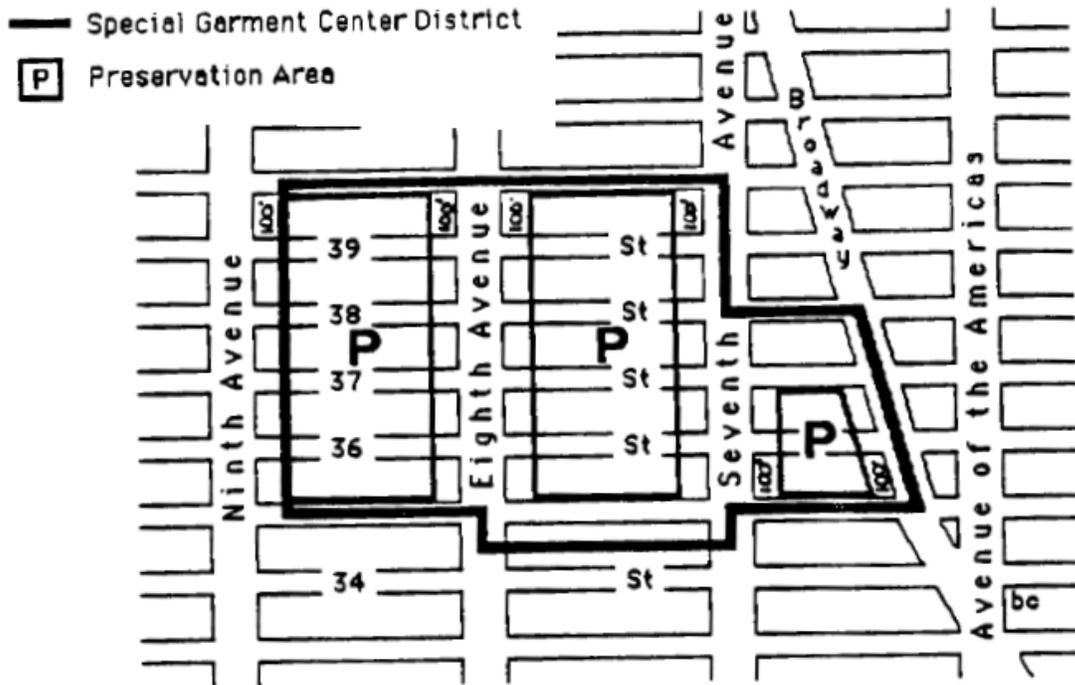
Burt Lazarin  
Chair  
Manhattan Community Board 4



Jean-Daniel Noland  
Chair  
Clinton/Hell's Kitchen Land Use Committee

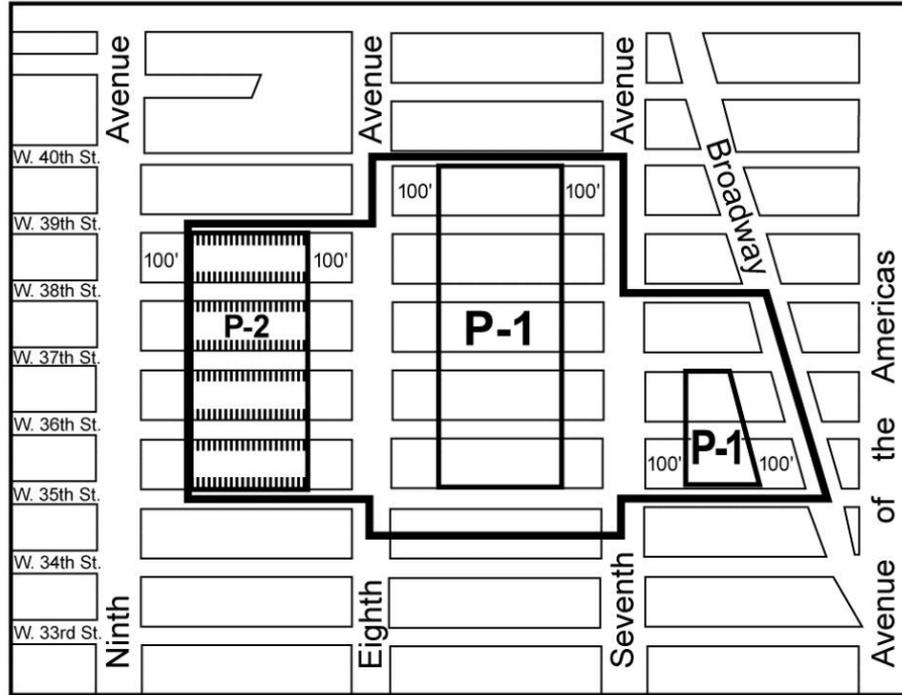
cc: Hon. Jerry Nadler, U.S. Congress  
Hon. Brad Hoylman, New York State Senate  
Hon. Richard Gottfried, New York State Assembly  
Hon. Corey Johnson, Speaker, City Council  
Hon. Gale A. Brewer, Manhattan Borough President  
Lydia Downing, NYC EDC  
Morgan Jones, NYC EDC  
Barry Dinerstein, NYC DCP  
Annie White, NYC DCP  
Vikki Barbero, Chair Manhattan Community Board 5

Attachment A: SGCD Boundaries, 1987



See Attachment B: Current SGCD Map

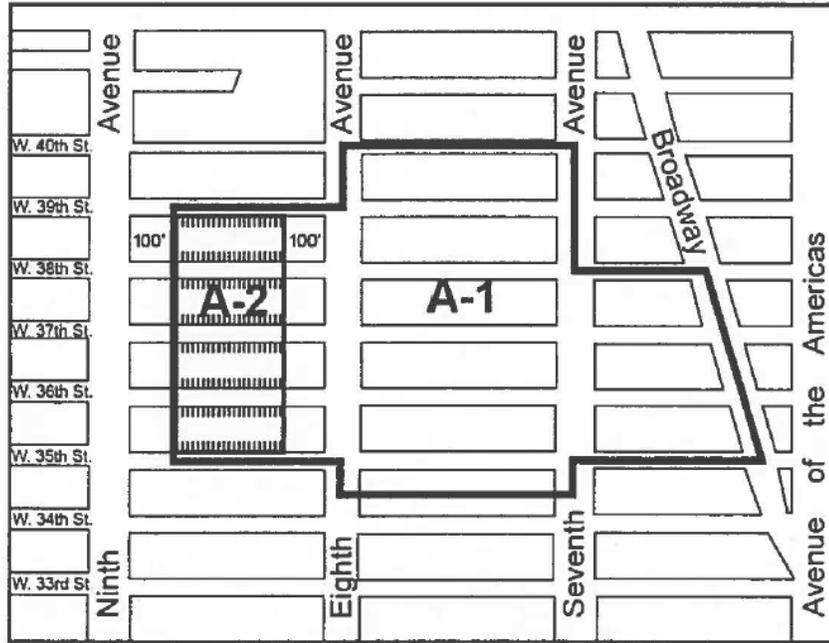
Special Garment Center District Plan



-  *Special Garment Center District*
-  *Preservation Area*
-  *Street Wall* required pursuant to 121-32(a)

**Attachment C: Proposed SGCD Map**

Special Garment Center District and Subdistricts



- #Special Garment Center District#**
- A-1 Garment Center Subdistrict A-1**
- A-2 Garment Center Subdistrict A-2**
- ||||||| #Street Wall# required pursuant to 121-42 (a)**

See Attachment D: MCB5 Resolution, dated July 13, 2018

MANHATTAN COMMUNITY BOARD FIVE

Vikki Barbero, Chair

450 Seventh Avenue, Suite 2109  
New York, NY 10123-2199  
212.465.0907 f-212.465.1628

Wally Rubin, District Manager

July 13, 2018

Hon. Marisa Lago  
Chair of the City Planning Commission  
22 Reade Street  
New York, NY 10007

Re: *Application by the Department of City Planning (DCP) and the Economic Development Corporation to amend the zoning text for the Garment District*

Dear Chair Lago:

At the regularly scheduled monthly Community Board Five meeting on Thursday, July 12, 2018, the following resolution passed with a vote of 31 in favor; 1 opposed; 1 abstaining:

WHEREAS, The Department of City Planning (DCP) and the NYC Economic Development Corporation (EDC) propose to change zoning requirements to the Special Garment Center District (SGCD) which is located generally from West 35th Street to West 40th Street (south/north) and from Broadway to just east of 9th Ave (east/west); and

WHEREAS, The SGCD is further subdivided into subdistricts P-1 and P-2, with subdistrict P-1 located within the borders of Community District Five, and subdistrict P-2 located entirely within Community District Four; and

WHEREAS, The 1916 Zoning Resolution established what is now known as the Garment District, and was amended in 1987 to establish the Special Garment Center District due to concerns that Manhattan real estate pressures would accelerate manufacturing job losses in the Garment District; and

WHEREAS, The primary purpose of the amendment was to slow the conversion of manufacturing space into office space on side streets in the district; and

WHEREAS, The conversion to office use in the special district's "preservation" area was prohibited unless an equivalent amount of floor area was set aside for designated preferred uses; and

WHEREAS, The conversion to office use requires certification by the chair of the CPC and a deed restriction on the preserved space; and

WHEREAS, Since the establishment of the SGCD in 1987, there have been ten certifications for conversion of approximately 180,000 SF of space total; and

WHEREAS, Few property owners have conformed to the preservation requirements applicable to the conversion of new office space; and

WHEREAS, Of the 9.9 million SF in the preservation area, currently 900,000 SF is manufacturing space, 560,000 SF is warehouse space, and 1.6 million SF is showroom use, with about 2.76 million SF either not documented, vacant or retail use); and

WHEREAS, Currently, 4 million SF out of the 9.9 million SF of the preservation area are non-conforming office space; and

WHEREAS, The buildings that are a part of this 4 million SF still have certificates of occupancy for factory and warehousing uses, and therefore cannot obtain building permits for major capital renovations because they have not complied with zoning ordinances; and

WHEREAS, The proposed change would allow many current buildings owners to update the Certificates of Occupancy for their existing buildings after failing to comply with city requirements; and

WHEREAS, The proposed zoning changes would reinstate M1-6 zoning specifications for the A-1 subdistrict and lift the existing manufacturing preservation requirements; and

WHEREAS, The proposal would modify height and setback regulations for A-1 subdistrict buildings by requiring buildings to have their street wall on the street line; and

WHEREAS, These modifications would allow for denser buildings with more shadows at street level and does not provide a maximum height restriction; and

WHEREAS, Existing M1-6 regulations would be replaced by new rules similar to height and setback rules found in M1-6D districts, which are more in keeping with the existing context of loft districts in Manhattan; and

WHEREAS, M1-6 zoning permits commercial, manufacturing and community facility uses having a maximum base FAR of 10 and maximum bonus FAR of 12 through the provision of a public plaza; and

WHEREAS, The proposal would subject the entire SGCD to C6-4 zoning restrictions on sign regulations; and

WHEREAS, The proposal would subject the entire SGCD to permit a building to operate a new Hotel Use only by City Planning Commission Special Permit (a modified ULURP procedure); and

WHEREAS, The proposed Hotel Special Permit would not apply to Transient Facilities operated for a Public Purpose and would require the City Planning Commission to find whether or not a proposed hotel in the A-1 subdistrict would “facilitate a diverse business district”; and

WHEREAS, The EDC with their subsidiary, the Industrial Development Agency (IDA), propose to support the fashion ecosystem by providing rent stability to fashion manufacturers and to continue and bolster the Made in NY fashion programs while giving new priority to Garment District businesses; and

WHEREAS, Fashion manufacturers include companies that transform raw materials into fashion-related products on-site and companies that provide a service along the supply chain of garment production; and

WHEREAS, IDA is instituting a new tax abatement program for building owners in the Garment District who choose to participate that would cap the rent of fashion manufacturers in program-buildings to a maximum of \$35 per square foot gross rent, mandate fashion manufacturers to exercise lease options for at least 15 years, and the fashion manufacturers and the building owner must comply with visits and an annual review by IDA; and

WHEREAS, Landlords of four Garment District buildings comprising a total of nearly 300,000 square feet have already been identified as willing to enter into this tax abatement program with NYCIDA; and

WHEREAS, The City will release a competitive procurement for a new Public-Private partnership in September 2018, committing up to \$20 million in city capital for a non-profit developer to purchase, operate, and manage a building located in the Garment District for the purpose of preserving garment manufacturing in the Garment District; and

WHEREAS, EDC has committed \$15 million over ten years through their Fashion Manufacturing Initiative, public-private partnerships, apprenticeship grants, business grants, planning assistance, and industry events and EDC will now prioritize Garment District businesses for these programs; and

WHEREAS, CB5 participated in the 2017 Garment Center Steering Committee co-chaired by Borough President Gale Brewer and current Council Speaker Corey Johnson and CB5 continues to support all of the Steering Committee's Report Recommendations; and

WHEREAS, CB5 is highly concerned about the enforcement of landlord and manufacturer compliance and public oversight of NYCIDA because of the acknowledged neglectful and ineffective enforcement history by Department of Buildings under the current Garment District zoning; and

WHEREAS, Although the EDC maintains that a detailed assessment of the proposed action's potential direct and indirect impacts on the apparel manufacturing industry and the broader fashion industry is warranted, a specific analysis of impact to the current apparel manufacturing industry supply chain has not been performed including, but not limited to, wholesalers, notions, and fabric suppliers; and

WHEREAS, The proposal's inclusion of a new Workforce Development Program, which is stated to include "business plan development" and "technical assistance" to businesses in the garment industry, while admirable in the abstract, is not specific in regard to the mechanism for public input into the most critical needs facing small businesses, or the eligibility requirements for businesses who seek to gain support; and

WHEREAS, Community Board Five believes that robust outreach to small businesses, individual designers, seamstresses and workhouses that serve other small businesses is absolutely mandatory and must be an explicit part of the proposal, including efforts to overcome language barriers, in order to help that part of the ecosystem and supply chain not only survive but thrive; and

WHEREAS, CB5 is supportive of any efforts by public or private entities to work with community stakeholders to maintain a robust fashion manufacturing ecosystem in the Garment District; and

WHEREAS, As CB5 is fully aware that the Garment District's manufacturing model is based on high quality, not high volume, we support the training of highly skilled garment production specialists, craftsmen, and artisans; and

WHEREAS, CB5 is extremely concerned about unintended consequences of restricting hotel development through a Hotel Special Permit, and that the City Planning Commission could formulate a metric for evaluating hotel development without sufficient deference to the opinions of the community board regarding new hotel projects; and

WHEREAS, CB5 has considerable concern about proceeding with the rezoning prior to the new protections and programs being put into place; therefore, be it

**RESOLVED**, Community Board Five **denies** the proposed rezoning for the Special Garment Center District **unless**:

1. Real-time easily-accessible data are made available to the public to see and tabulate that NYCIDA is reviewing leases and enforcing compliance under the terms of the public-private partnership and the tax-abatement program;
2. The lease renewal options for fashion manufacturers in the tax abatement program are permanent, just as it is in the public-private partnership for the acquisition of a building devoted to garment industry use;
3. The city makes a concerted effort to find additional building owners who will agree to be a part of the tax-abatement program so that *at least* 500,000 square feet of permanently affordable fashion manufacturing space will remain in the Garment District;

4. Greater efforts by EDC and IDA to partner with additional workforce talent pipelines, educational institutions, and community organizations for vocational training, job recruitment, and continuing education through multiple languages;
5. Any increase to the permitted height of the street wall be implemented in concert with a cap on the maximum height of buildings in the area;
6. The proposed language in section 121-32 (a) of the SGCD allows buildings with a public plaza to not have to abide by the street wall requirements be revised to prohibit the creation of midblock plazas;
7. The proposed language in section 121-30 of the SGCD regarding the prohibition of flashing lights be revised to include Subdistrict A2;
8. More detailed and clear parameters be established to determine whether a hotel development seeking a special permit in the special district enhances the diversity of businesses in the area;
9. The application process before the IDA proceed at the timeline presently stated by the EDC, namely, that the application appear before the board of the IDA at the September 2018 public hearing, with the board's vote to take place on September 18, 2018.

Thank you for the opportunity to comment on this matter.

Sincerely,



Vikki Barbero  
Chair

Charles Jordan  
Chair, Land Use, Housing & Zoning Committee

## See Attachment E: Historic Properties and Landmarks

Please see below information prepared by the NYC Landmarks Commission in relation to historic properties in and around the SGCD extracted from the 2005 Hudson Yards Environmental Impact Statement and the 2018 Garment Center Text Amendment Environmental Assessment Statement.

Name or Building Type	Address	NYCL-Eligible	S/NR-Eligible	Citation
Manhattan Opera House	311 West 34 <sup>th</sup> Street	x	x	2005 HY EIS pg 9-46 2018 GCTA EAS pg E-11
New Yorker Hotel	481 8 <sup>th</sup> Avenue	x	x	2005 HY EIS pg 9-55 2018 GCTA EAS pg E-10
Sloan House Y	360 West 34 <sup>th</sup> Street	x	x	2005 HY EIS pg 9-41 2018 GCTA EAS pg E-11
Commercial Building	300 West 38 <sup>th</sup> Street	x	-	2005 HY EIS pg 9-13
Former Co-Edison building	308-312 West 36 <sup>th</sup> Street	-	x	2005 HY EIS pg 9-47
Barbour House	330 West 36 <sup>th</sup> Street	-	x	2005 HY EIS pg 9-40
Webster Apartments	419 West 34 <sup>th</sup> Street.	-	x	2005 HY EIS pg 9-42



### Manhattan Opera House

Designed by William E. Mowbray to resemble an Italian palazzo, the former Manhattan Opera House (S/NR-eligible, NYCL-eligible) at 311 West 34<sup>th</sup> Street was constructed between 1901 and 1907 for producer Oscar Hammerstein, who sought to compete with the Metropolitan Opera. The nine-story, brick-and-stone building is set on a two-story rusticated stone base. Five arched entrances with pronounced keystones and voussoirs are located on the ground floor. The main body of the building, in keeping with its original function as a performance space, is largely solid surface. There are, however, five bays of small windows in the center of the façade. The third-floor windows are arched, with stone enframements. The sixth-floor windows are arched double-windows with stone colonnette mullions and stone tympanums. Stone balconies with decorative panels are located below each of the double-windows. The top portion of the building is designed as an attic story punctured with small, square window openings and adorned with stone band courses, cartouches, and a cornice. In 1923, the building was altered for the New York Freemason group, the Ancient Accepted Scottish Rite of Free Masonry. Their name is still inscribed in the frieze above the base. A modern canopy is attached to the ground floor. In a letter dated November 18, 2003, the LPC determined that the former opera house also appears to be eligible for LPC designation. The Manhattan Opera House was built in a low-rise

residential area that included an adjacent church at 305-309 West 34th Street and the New York Institute for the Blind across the street. The context now consists of the tall Hotel New Yorker adjacent to the east, Madison Square Garden, and the 57-story, metal and glass 1 Penn Plaza building.



### **New Yorker Hotel**

The New Yorker Hotel (S/NR-eligible, NYCL-eligible) at 481-497 Eighth Avenue was constructed in 1928–1930 to designs by Sugarman & Berger. The bold massing of the 43-story, brick-and-stone building is the most significant feature of its design. Corner towers rise in a series of deep setbacks to the central tower, which has a form accented by deep light courts on each of its façades. On the north and south façades, there are two light courts that create a central pavilion flanked by the corner towers; on the Eighth Avenue façade, there is only one central light court. Most of the brick wall surface, above the stone base, is simply articulated with vertical bands of windows. Art Deco ornamentation is found in carved stone blocks at the parapet

of each setback, in panels above the fourth-floor windows, and on the base. From 1975 until recently, the building housed the national headquarters of the Holy Spirit Association for the Unification of World Christianity (Unification Church). It now functions again as a hotel. In a letter dated November 18, 2003, the LPC determined that the hotel building also appears to be eligible for LPC designation. The hotel was constructed adjacent to the east of the Manhattan Opera House. Other surrounding buildings in 1930 included numerous garment loft buildings, and some low-rise residential buildings across the street to the south at 304-328 West 34th Street. Currently, the immediate context primarily consists of non-descript, low-rise retail stores and heavily altered, low-rise commercial buildings. One Penn Plaza is located across Eighth Avenue to the southwest.



### **William F. Sloan Memorial Branch of the YMCA**

Cross & Cross designed the William F. Sloan Memorial Branch of the YMCA (S/NR-eligible, NYCL-eligible) at 360 West 34th Street. Built in 1929-1930 and named for William Sloan, the chairman of the National War Council of the YMCA during the First World War, the building originally functioned to provide, for men in the armed services, social facilities and sleeping accommodations for more than 1,600. It aimed to address the lack of centrally located facilities for the service men quartered in and passing through the City. Sleeping accommodations were also provided for transient civilians on a secondary basis. Also fronting on West 33rd Street, the 14-story brick

building is designed in the neo-Georgian style. The two-story base has a limestone ground floor that contains entrances with broken segmental pediments and a second floor with round-arched windows with stone keystones. A central light court on the West 34th Street façade creates corner pavilions that are set back above the ninth floor. Stone detailing includes quoins, string courses, window keystones and voussoirs, balustrades, cartouches, and pediments that form the crowns of the corner pavilions. The south façade does not use setbacks. Abutting a three story building on Ninth Avenue, the west façade carries the design of the north and south façades and also utilizes the corner pavilion motif. In a letter dated November 18, 2003, the LPC determined that this building also appears to be eligible for LPC designation. When the YMCA was completed, the 18-story J.C. Penney office building (described below) was located adjacent to the east. Other defining features of the immediate vicinity were the portion of the Penn Station rail yard, on the west half of the block that contained the U.S. General Post Office, and low-rise residential buildings across Ninth Avenue. The existing context is similar, although there are fewer low-rise residential buildings. A large parking lot is located across West 33rd Street to the north.



### **300 West 38th Street**

The three-story building (NYCL-eligible) at 300 West 38th Street and 557 Eighth Avenue is a unique, brick-and-terra-cotta, Beaux Arts structure built in 1902-1903 that originally housed offices on the ground floor and dwellings on the upper floors. Stein, Cohen & Roth designed the small rectangular building with a profusion of ornamentation. Although

the ground floor has been altered with modern storefronts, the upper two floors retain their original features. Filling the majority of the east and north façades are two rows of windows with terra cotta architraves. The windows are also carried across the angled northeast corner of the building. On the second floor, the window architraves have cornices and friezes decorated with floral reliefs. On the third floor, the architraves lack cornices, but are more elaborately molded. At each end of the north façade, there are two double-height, metal bay windows. Brick piers articulate the spaces between the windows. Except at the corners, the piers are only the height of the second floor, but are capped with terra cotta heads set on a base of floral reliefs that, with the sills of the adjacent windows, create a terra cotta course across the base of the third floor. A deeply projecting, sheet metal cornice caps the building. Supported on brackets that are attached to the double-height corner piers, the cornice has a frieze with panels of geometric reliefs and a parapet decorated with roundels, cartouches, and relief panels. In a letter dated November 18, 2003, the LPC determined that this building appears to be eligible for LPC designation. This small commercial and residential building was constructed in a primarily residential district composed of buildings of comparable height. Several movie theaters and factories were also located nearby. It is now completely surrounded by tall garment loft buildings.



### **New York Edison Company**

The four-story brick Beaux Arts building at 308-312 West 36th Street is a former New York Edison Company electrical distribution station (S/NR-eligible). Designed by William Whitehill and constructed in 1925–1926, it is divided into two bays and set on a large base. The central bay is largely clad in stone, with the base dominated by a large round-arched entrance and the upper stories designed with wall arcades. At the entrance, small pilasters support the arch, which is flanked by double-height recessed pilasters with stylized capitals. A stone cornice with stylized dentils is set above the base. The central bay above the base consists of two wall arcades of three round-arched window bays and four stone pilasters each. The lower arcade is two stories, and stone spandrel panels separate the second and third floor windows. The upper arcade is compressed in detail. The side bay consists of a largely blank brick wall surface, relieved only with recessed central sections and narrow, round-arched lancet windows demarcating each floor. At the base, there are round-arched entrances in each bay. A stone cornice caps the building. Several alterations have been made to the base—the enframingent of the east entrance has been removed and the central entrance has been partially filled with modern glass, and the doors and sash removed (although an original metal spandrel remains). Low-rise residential buildings were adjacent to the Con Ed building when it was constructed in 1925. Numerous garment loft buildings were also located nearby. The context is largely similar.



### **Barbour Dormitory**

Adjacent to the east of the Christ Church Memorial (see below), the former Barbour Dormitory (S/NR-eligible) at 330 West 36th Street is a seven-story, brick-and-stone English Gothic building designed by Hill & Stout. Built in 1915–1916 as a memorial to William D. Barbour, who was associated with the Brick Presbyterian Church, the Barbour Dormitory served as a settlement house for working girls. It is divided into three bays, which contain, at the base, a central entrance flanked by windows. The entrance and windows are recessed and framed in stone. A terra cotta band carved with floral patterns runs above the base. On the third through sixth floors, the bays contain windows with stone enframements spaced by stone spandrels with Gothic tracery. Resting on a stone entablature with quatrefoil designs, the top floor is ornamented with panels of stone lancet windows and stone spires. When the Barbour Dormitory was constructed, West 36th Street between Eighth and Ninth Avenues was defined by Christ Church Memorial, a school, a cemetery, and low-rise residential buildings. Although Christ Church

Memorial remains, the street is currently characterized by tall garment loft buildings, a few non-descript low-rise commercial structures, and two parking garages, one of which is adjacent to and east of the dormitory building.



### **Webster Apartments**

Parish & Schroeder designed the 14-story Webster Apartments (S/NR-eligible) at 419 West 34th Street. It was built in 1922–1923 from a gift of Charles B. Webster, a former senior partner of R. H. Macy & Company, as an apartment hotel for working women. The fund set up by Webster specified that the apartment hotel was to cater to working women with modest salaries. Also meant to provide the services of a social club, the building originally contained a lounge, a dance and lecture hall, a kitchen and dining room, a library, an infirmary, ten small reception rooms, and sewing rooms and laundries on the residential floors, in addition to 360 bedrooms. The permanent staff included a woman manager, housekeeper, dietician, nurse, chef, and associated help. Designed in a respectable, austere neo-Georgian style, as thought to befit an apartment for working women in the early 20th century, the building is organized in a U-plan with a large central light court fronting on West 34th Street above the three-story base. Below the light court is a large stone entrance porch composed of columns supporting an entablature. Above the entablature is a three light stone window and broken segmental pediment. Segmental tympanums with carved decorations are set above the first-floor windows. The top two floors have the form of a pilastered loggia set on a stone balustrade and ornamented with carved stone spandrel panels. Stone cornices are located above the base and at the roofline. The Webster Apartments were constructed on a block of mostly low-rise residential buildings. Mary's Hospital for Children (built in 1901 and non-extant) was located to the east at 405-411 West 34th Street and 435-437 Ninth Avenue. St. Michael's RC Church Complex (described below) was located directly across the street to the south. The Ninth Avenue elevated train also ran nearby the apartment building. Within a few years, two large apartment buildings and the Master Printers Building were located in the immediate vicinity. Construction of Dyer Avenue demolished many buildings in the area. An entrance to the tunnel approach is now adjacent to the west of the apartment building. A boxy eight-story building with strip windows is located on this resource's east side on the site of the children's hospital.